

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE.

SHANE K. HOPKINS
PLAINTIFF

v.
C/o JOHN PUSEY, ETAL.,
DEFENDANTS

CIV. NO. 05-870-SLR

GD scanned

2007 FEB -9 PM

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

PLAINTIFF SHANE K. HOPKINS RESPONSE TO DEFENDANT
REQUEST FOR PRODUCTION OF DOCUMENTS, SUPPLEMENTAL.

GRIEVANCE #9908 RE: VERBAL ABUSE BY C/O LLOYD 12/10/04 PG#1

LETTER TO: JOHN L. REED ESQ: RE: REPRESENTATION REQUEST 12/24/05 PG#2

LETTER TO: WARDEN T. CARROLL: RE: MEDICAL FILE REVIEW 5/12/05 PG#3

LETTER TO: AGENT BRENDA WISE: RE: INVESTIGATIVE REPORT 12/27/05 PG#4

LETTERS TO: COLM F. CONNOLLY ESQ: MAILED 7/12/05 AND 8/29/05 PG#5 AND #6

RECIPT FOR BOOKS ALLOWED THROUGH THE MAIL. 6/5/04 PG#7

CONFISCATION RECIPT FOR THE SAME BOOKS. 11/26/04 PG#8

ALL

FORM #584

GRIEVANCE FORM

12/30/04

FACILITY: D.C.C. SmyrnaDATE: 12-12-04GRIEVANT'S NAME: Shane HopkinsSBI#: 253918CASE#: 9908TIME OF INCIDENT: Approx 9:30 A.M.HOUSING UNIT: # 18 - C - U # 6

BRIEFLY STATE THE REASON FOR THIS GRIEVANCE. GIVE DATES AND NAMES OF OTHERS INVOLVED IN THE INCIDENT OR ANY WITNESSES.

While at a Major Adjustment Board Hearing C/O Lloyd interrupted the hearing by saying that "When he talks he sounds gay" to officer Pusey who was at the hearing. I turned to L.T. Savage and told him if I where to respond to such a comment that I would receive another M.A.B. write up. Also when C/O^s Lloyd and Pusey took me back to my cell C/O Lloyd stated that "I have to deal with pieces of shit like him all day". These comments came without any provocation, they where directed towards me in order to instigate a response.

ACTION REQUESTED BY GRIEVANT: These comments came as retaliation because of my accusations of abuse at the hands of fellow C/Os. This type of harassment and goading of me needs to be addressed because any verbal response from me is grounds for disciplinary action.

GRIEVANT'S SIGNATURE: Shane HopkinsDATE: 12-12-04WAS AN INFORMAL RESOLUTION ACCEPTED? (YES) (NO)

(COMPLETE ONLY IF RESOLVED PRIOR TO HEARING)

GRIEVANT'S SIGNATURE: _____

DATE: _____

IF UNRESOLVED, YOU ARE ENTITLED TO A HEARING BY THE RESIDENT GRIEVANCE COMMITTEE.

cc: INSTITUTION FILE
GRIEVANT

RECEIVED

DEC 20 2004

April '97 REV

Inmate Grievance Office

Pg # 1

DECEMBER 24, 2005 →

*: REVISED JANUARY 12, 2006

John L. Reed Esq.
ATTORNEY AT LAW
EDWARDS AND ANGELL LLP.
1100 NORTH MARKET STREET
SUITE 1200
WILMINGTON DELAWARE 19801-1246

RE: REQUEST FOR SUBMISSION BEFORE FEDERAL CIVIL PANEL.

DEAR COUNSEL:

ATTACHED HERETO WAS FILED ON 12-5-05 AND
I WOULD ASK THAT YOU SUBMIT THIS TO THE CIVIL PANEL FOR
THEIR REVIEW AND CONSIDERATION FOR REPRESENTATION HENCEFORTH.

THANK YOU FOR YOUR TIME AND HAVE A NICE HOLIDAY SEASON.

XC: FILE

CC: CLERK U.S. DIST. COURT (D. DE)

ATTACHMENTS: 3 COPIES OF COMPLAINT
ONE FOR EACH MEMBER
OF THE PANEL.

SINCERELY YOURS

Shane Hopkins

SHANE K. HOPKINS

#253918 17-A-L#4

1161 Paddock Rd

SMYRNA DELAWARE

19977-9679

MAY 12, 2005

WARDEN T. CARROLL
D.C.C. SMYRNA

RE: REQUEST TO VIEW MEDICAL FILE.

I NEED TO VIEW MY MEDICAL FILE AS TO AN INCIDENT ON 11-26-2004 IN ORDER TO SEE WHATS BEEN DONE AND WHAT I NEED TO ASK FOR BOTH MEDICAL AND PSY. SERVS. AS TO CONDITIONS I AM HAVING AS A RESULT AND TO OBTAIN NAMES TO WRITE IN ORDER TO ASK FOR ASSISTANCE.

Shane Hopkins
Shane Hopkins
#00253916 17-A
17-A-L#4 S.H.U.

XC: FILE

DECEMBER 27, 2005

AGENT BRENDA WISE
FEDERAL BUREAU OF INVESTIGATION
920 N. KING STREET STE. 104
WILMINGTON DELAWARE 19801

RE: 3RD REQUEST FOR COPY OF INVESTIGATIVE REPORT

DEAR AGENT WISE,

I HAVE NOT RECIEVED A REPLY TO MY PREVIOUS REQUESTS. PLEASE REVIEW AND PROVIDE SAME. I WOULD ALSO ASK OF YOU TO PROVIDE ME WITH COPIES OF ALL INVESTIGATION REPORTS DONE ON D.C.C. SMYRNA IN THE PAST 3 YEARS REGARDING ASSAULTS UPON INMATES BY CORRECTIONAL OFFICERS.*

THANK YOU FOR YOUR TIME IN THE AFORESAID.

SINCERELY YOURS,

Shane Hopkins
SHANE K. HOPKINS

#253916 17-A-L#4

1181 Paddock Rd.

SMYRNA DELAWARE
19977.

XC: FILE ✓

CC: Colm F. Canolly Esq

CLERK U.S. DIST. COURT D. DEL

ENCLOSURE(S): 5 PAGES

* THIS IS A 5 U.S.C. A. 5552 F.O.I.A.
REQUEST ADDITIONAL TO MY CASE.

JUNE 20, 2005
MAILED 7-12-05

Colm F Connolly Esq.

RE: ATTACHED LETTERS / COPIES

DEAR SIR,

I WANT YOU TO SEE THE AMOUNT OF TIME IT TOOK BETWEEN WRITING MY FIRST LETTER TO YOU TO THE ABOVE DATE AND I WANT YOU TO KNOW:

1) BRIAN ENGREM OF THE LAW LIBRARY HERE DID APON NOTICING MY COMPLAINT WAS RELITIVE TO AN ASSAULT APON MY PERSON DID:

A.) START A CAMPAIGN OF DELAY'S, DENIALS AND OUT-RIGHT RETALIATORY NEXUS TO ASSERT THESE TO YOU.

B.) HAS ON-GOING OF RETALIATORY ACTS FOR MY EVERY ATTEMPT TO TELL YOU AND THE A.C.L.U ETC. OF THESE ACTS.

I WOULD HOPE THAT YOU CAN MAKE A COPY OF THIS ABOVE 6-20-05 AND RETURN TO ME WITHIN 7 DAYS RECEIPT OF THE FOREGOING LEGAL MAILING I AM SENDING VIA ANOTHER INMATE SO THAT I KNOW IT GETS TO YOUR OFFICE AND WHERE UPON YOU CAN REPLY ACCORDINGLY.

XC: FILE

CC: ACLU OF DE.

M. JANE BRADY

MARIE A. OROURKE Esq. U.S. DEPT JUSTICE ✓

SINCERELY YOURS,

Shane Hopkins

SHANE HOPKINS

#253916

August, 2005 MAILED 8-29-05

Colm F. Connolly Esq.
U.S. ATTORNEY
1007 ORANGE ST. STE 700
Wilmington De. 19894

RE: ATTACHED AND NOTIFICATION AND CRIPA INVESTIGATION

DEAR SIR,

ON 6-20-05 I MAILED YOU THE ENCLOSED
FILINGS. I'VE NOT HEARD FROM YOU AND MY FAMILY
CONTACTED YOUR OFFICE AND WAS TOLD NO CERTIFIED
MAILING HAD BEEN RECEIVED BY YOUR OFFICE.

I AM AGAIN ENCLOSING AND MAILING BY
CERTIFIED MAIL THE SAME INFORMATIONALS IN ORDER TO
OBTAIN A DISPOSITION INTO MY CRIPA VIOLATIONS
INVESTIGATION REQUESTED AFORESAID.

THANK YOU FOR YOUR ATTENTION IN THE MATTER HEREIN.

XC: FILE

CC: MARIE A. OROURKE Esq U.S. Dept. Justice WASH. D.C.

ATTACHMENTS: (5) Mailings

SINCERELY YOURS,

Shane Hopkins

SHANE HOPKINS
#253918

1161 Paddock Rd.

Smyrna DE 19977

PG#6

Items Received Through the Mail

Inmate Name (Print): Ernest Brown SBI#: 253918 UNIT: M4123 DATE: 6-5-04

Received via: ☐ U.S. Postal ☐ UPS ☐ Other

Sender: _____

Store of Purchase: Prison Store

PO Box/Street: _____

PO Box/Street: 16250 Malvern Rd

City, St, Zip: _____

City, St, Zip: Lexington KY 40511

QTY Rec'd	Qty App	Item (Clothing)	Description (color, Ect)	Receipt Cost
<u>01</u>	_____	<u>Books/Periodic</u>	<u>Model of Demons</u>	_____
_____	_____	<u>Religious Bk/Pamphlet</u>	<u>the Bible Code</u>	_____
_____	_____	Other	<u>Merriam Webster's Collegiate Thesaurus</u>	_____
_____	_____	Other	<u>Merriam Webster Collegiate Dictionary</u>	_____
_____	_____	Other	_____	_____

[Signature]
Mail Room Officer Signature

6-5-04
Date

This Form has been received by the Property Officer with approved quantities being noted above.

Property Officer Signature

Date

1 copy returned to Mail Room.

Items were given to housing unit Officer for Distribution with one copy to Mail Room, one copy to I/M

Staff Signature

Date

I received the above-approved items. I request that the items not approved be sent to the following address at my Expense. If I have any questions, I understand that I am to write to the Mail Room.

Name: _____

Street: _____

City, St, Zip: _____

Inmate Signature

Date

Inmate keeps one copy and returns signed copy to the Mail Room. Mail Room forwards copy to Property Officer.

FORM #: 677

Revised - 6/25/03

Certificate of Service

I, SHANE K. Hopkins, hereby certify that I have served a true
and correct cop(ies) of the attached: Production of Documents
SUPPLEMENTAL upon the following
parties/person (s):

TO: STACEY XARHOULAKOS
DEPUTY ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
820 N. FRENCH STREET 6TH FLOOR
WILMINGTON DELAWARE 19801

TO: _____

TO: JOHN W. SHAW
THE BEAUXVOIE BUILDING
1000 WEST STREET 17TH FLOOR
WILMINGTON DELAWARE

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 6th day of FEBRUARY, 2007

Shane Hopkins